## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF MISSISSIPPI SOUTHERN DIVISION

DOUGLAS HANDSHOE \* CASE NO. 14-cv-159

VERSUS \* JUDGE: KEITH STARRETT

\*

DANIEL G. ABEL \* MAG. JUDGE: MICHAEL T. PARKER

AFFIDAVIT OF CHRIS E. YOUNT

CAME CHRIS E. YOUNT, who appeared and being sworn by the undersigned authority for the State of Louisiana, thereafter testified:

1.

I am Chris E. Yount, a person of the age of majority, domiciled in the Parish of Jefferson, State of Louisiana.

2.

I am the sole custodial parent of the minor child whose drawings are at issue in the publication of his drawings and comments made by Mr. Douglas K. Handshoe on Slabbed.org.

3.

As the sole custodial parent of the minor child, I have exclusive authority over any of his materials and his property including but not only those such as his drawings which Mr. Handshoe has published on Slabbed.org and which the Hon. Judge John J. Molaison, Jr. of the 24<sup>th</sup> Judicial District Court for the Parish of Jefferson, has ordered removed by me, my ex-wife and attorney Mr. Abel [Exhibit No. 1 - Judgment].

Neither Mr. Handshoe nor anyone has been given permission to use in any manner—and certainly not in the defamatory manner used on Slabbed by Mr. Handshoe—or to publish anything which is owned by the minor child and governed by me as his sole custodian.

5.

Mr. Handshoe at one time made false representations to the courts that he obtained the drawing from the Clerk of Court's internet website, JeffNet. The images of the drawings that are referenced by Mr. Handshoe were not available on JeffNet, as they were not imaged accordingly because of their content. The Clerk has confirmed that no JeffNet user purchased the drawings.

6.

Mr. Handshoe subsequently made another false representation that he was able to download the drawings from a modern art website to which the minor child subscribes. Contact with the website has proved that the drawings published by Mr. Handshoe were not ever posted on the website and could not have been posted considering that the young man was in fact a minor and the website screening authorities knew that he was a minor from his user-application.

7.

Once it was learned that Mr. Handshoe had posted the minor child's drawings on his website Slabbed.org. counsel and Mr. Yount brought it to the attention of the court and the Hon. Judge John J. Molaison, Jr. ordered the drawings and Douglas Handshoe comments about the drawings removed by me, my ex-wife and my attorney Mr. Abel [Exhibit No. 1-Judgment].

8.

In compliance with Judge Molaison's order, Mr. Abel wrote to the webhost informing it that Jefferson Parish Judge Molaison had ordered the minor child's drawing and Mr. Handshoe's related

comments at Slabbed.org, removed from the internet. The webhost did so.

9.

Mr. Handshoe's commented that the child's drawings were pornographic and that the 24<sup>th</sup> Judicial District Court and Judge Raymond Steib were remiss in not addressing and failing to deal with such [alleged] sexual drawings. If Mr. Handshoe believed that the drawings were pornographic his posting of the drawings and tweeting about them would be improper.

10.

Mr. Handshoe has repeatedly stated that the drawing depicts a row of homosexual robots sodomizing a small boy.

11.

In fact, the drawing depicts a robot having sex with a girl, whose gender is evident from the drawing.

12.

The medical expert appointed by the court in the domestic matter noted that drawings of this nature are what boys at 15 years of age, think about when they are going through the stages of maturing and hormonal development. He said the drawings were normal for a boy of that age.

Upon examining the drawing, the Judge made the same observation about what boys of that age think about and often draw and that if anything such drawing demonstrate that the minor child was going though what were normal developmental stages.

14.

Within this year, the Jefferson Parish District Attorney's office has taken over aspects of the custody proceedings. The juvenile court judge now assigned to the matter of child support recently sentenced Ms. Tami Steitle to 90 days in jail for her failure to pay seven months of child support due

to the State of Louisiana. The judge suspended the incarceration giving Ms. Steitle to pay the State of Louisiana what she owes.

15.

The judge also noted Ms. Steitle's false statements to the Court and noted the false statements on the record. The Mandeville Police Department recently removed the child from Ms. Steitle's home and returned him to me because of fifteen text messages the minor child sent regarding his fear as to his mother's mental condition and her anger.

16.

Defendant Douglas K. Handshoe is a resident of Bay St. Louis, Mississippi. He publishes an Internet web site know as the Slabbed blog /aka/ Slabbed New Media, LLC. which targets Louisiana as one of its primary audiences and therefore targeted me.

17.

Defendant Slabbed.org / Slabbed New Media, LLC is INTERNET WEBSITE which is used by Handshoe and others to cyber-stalk and defame private persons as well as public officials. Five Courts including the federal courts in Mississippi have found that Mr. Handshoe conducts campaigns to destroy and defame private persons from his website Slabbed.org. The Jefferson Parish Court has found that I am a private person and that my domestic case is not a public issue.

18.

Despite the fact that I am a private person and my divorce is a private issue, Mr. Handshoe has published and created the false innuendo that I sodomized and permitted others to sodomize my son. In so doing, Defendants have also violated Louisiana law protecting the identity of minors, and used 24th Judicial District documents to injure not only me but also my son.

Mr. Handshoe has committed at least two acts of defamation on the Slabbed blog, a cause of action for defamation that arise out of a violation of Louisiana Civil Code article 2315. Such a violation constitutes a breach of duty, or fault, and may be actionable under C.C. 2315, which provides that "[e]very act whatever of man that causes damage to another obliges him by whose fault it happened to repair it."

20.

Mr. Handshoe has intentionally inflicted emotional distress on me, Chris Yount. Mr. Handshoe has done so in concert with my ex-wife, who placed the original drawings into the record of the 24<sup>th</sup> Judicial District Court unsealed. Mr. Handshoe and his attorney have joined my ex-wife in her attempts to defame me and to influence the courts with statements he posts on his website.

21.

Defendant Handshoe has stated that the Slabbed blog has 1 million unique visitors annually.

22.

Mr. Handshoe published the drawings on a Slabbed web site page entitled "Very disturbing child welfare issues raised in 24th JDC case."

23.

Mr. Handshoe published that "the child has been failed by the justice system," implying that a judicial decision to leave minor child in the sole custody of his father was done in error because I and others were and would sexually molesting the minor child. His statements are lies.

24.

Mr. Handshoe published a caption beneath the drawing: "A picture drawn by a minor (male) of acts of sodomy contained in a 24th JDC case. Name withheld to protect the minor."

Despite falsely pretending to protect the name of my minor son, Mr. Handshoe conspired to reveal the identity of my minor son and the did in fact post my name and identity.

26.

Mr. Handshoe's attorney Jack E. "Bobby" Truitt entered the comments section of the web page. Mr. Handshoe published the following under Mr. Truitt's name: "Are you able to tell me which case this came from?" Mr. Truitt's questioning is a ruse used by Truitt and Handshoe to get information online which defames a number of persons, including me and my son.

27.

Mr. Handshoe then published the domestic case name: "Yount v Steitle," making clear the minor involved was my son and that the instance of alleged failure in the judicial system was the during my divorce proceedings.

28.

On February 18, 2014, Mr. Handshoe's web site, the Slabbed blog, was subsequently taken down by Defendant Handshoe's service provider due to a violation of that web host's terms of service by Handshoe, including infringing the copyright of third parties.

29.

On the same day, Handshoe found a new web host and started publishing the Slabbed blog anew.

30.

On February 21, 2014, Defendants published the drawing contained in Exhibit A of Mr. Handshoe's current lawsuit again on the Slabbed blog. Mr. Handshoe again filed it as an exhibit in this federal matter in the Southern District of Mississippi.

Mr. Handshoe further published: "But that case gets better because Judge Ray Steib recused himself after a disturbing picture drawn by Yount's minor child prompted an outside intervention."

32.

Mr. Handshoe further published: "And of course the picture drawn by the child imparts the reason why this became such an important matter. To the extent my own Mother was a recognized special needs director for three K-12 school districts here in Mississippi, I know enough to know there is some serious human psychology at play thus the "important matter" part."

33.

Subsequently Judge Molaison reviewed the drawings and ordered them sealed in *Yount v*. *Steile* as well. He also ordered the parties to do whatever would be necessary to take the postings and drawings from the minor child off of the internet.

34.

Mr. Handshoe republished the drawing contained in Exhibit A at the URL: <a href="http://slabbed.org/">http://slabbed.org/</a> wp-content/uploads/2014/02/divorce-imaged-1-23-14.jpg. In this instance of publication, Mr. Handshoe did not pretend he was not identifying me and my minor son.

35.

Mr. Handshoe's falsely published the implication that an "outside intervention" regarding the sexual molestation of his son caused the relevant judge to rescue himself. This is false. The defamatory innuendo published by the Mr. Handshoe was compounded by referring to the Mr. Yount as his attorney's "in-house troll." I work for a law firm but not for Mr. Abel firm.

36.

Mr. Handshoe's attack on Judge Steib and his statement that the Judge Steib's recusal had

to do with the drawing in Exhibit A is false and also defamatory.

37.

Defendant Handshoe's statement that he has some imparted expertise in human psychology and that I and others are molesting my son is false and defamatory. When read in the context of previous publications about me on the Slabbed blog, the false and injurious innuendo regarding sodomy is made even more explicit and injurious to Slabbed's audience.

38.

Mr. Handshoe's published statements about me are false and unprivileged, reaching a broad audience through the medium of an established web site. Mr. Handshoe's repeated publications were intentional and malicious and sociopathic. Both I and my son have been injured as a result.

39.

In particular, Mr. Handshoe's publication is defamatory per se, and accuse me of criminal and morally reprehensible conduct involving my minor son.

40.

After Defendants' initial publications in February, 2014, the Court sealed parts of the court record, including the minor child's drawing. At the order of the Court, attorney Abel took action to have the drawing removed from publication by sending notice to the Defendants' web host, including a notice of copyright infringement regarding publishing the drawing without permission. A copy of the Court Order was given to Handshoe by the web host.

41.

The drawing was temporarily removed from the web site. However, on or around March 19, 2014, the Defendants republished the drawing juxtaposed with defamatory words about me with full knowledge that the drawing was sealed by court order.

At the instruction of a juvenile protection officer who met with and spoke with my attorney, I have spoken with attorneys in the United States Attorney's office in New Orleans. They assigned an agent and instructed me to provide all information and evidence to the New Orleans FBI. I have done so and have spoken with the agent in charge as well.

43.

Mr. Abel my attorney has met with the U.S. Attorneys in New Orleans Office and has also communicated with the U.S. Attorney's office in the Southern District of Mississippi. All matters regarding Mr. Handshoe's cyber-stalking of my son, are to and have been reported immediately.

44.

Mr. Abel my attorney has also met with persons in the Louisiana Child Protection office and have given them the information pertaining to Mr. Handshoe's actions. Their communications are ongoing.

45.

Mr. Abel my attorney has also met with ADAs and investigators in the New Orleans District Attorney's office and the Jefferson Parish District Attorney's office about Mr. Handshoe's cyberstalking of my son and me. Mr. Abel's contacts and communications with those law enforcement officers is ongoing as well.

46.

I have personal knowledge of all the facts and statements set forth in my affidavit and hereby verify that those facts and statements are true and correct to the best of my information and belief having been involved in and personally investigated these matters to protect my son and prevent the ongoing attacks on my son by Mr. Handshoe, through the defamatory use of his website Slabbed.org.

## **JURAT**

| Sworn to   | and signed before me, t | he undersigned authority for the Sta | te of Louisiana, on |
|------------|-------------------------|--------------------------------------|---------------------|
| this $3$ : | day of August           | 2014.                                |                     |
|            | Chi                     | ris K Yount, Affiant                 |                     |

Daniel G. Abel, Notary Public No. 8348 Life Commission

DANIEL G. ABEL
NOTARY PUBLIC
No. 8348
LIFE COMMISSION